

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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JAN 25 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)	
)	
Amendment of Section 73.202(b),)	MM Docket No. 94-_____
Table of Amendments,)	RM-_____
FM Broadcast Stations)	
(Cordova, Alabama))	

To: Chief, Allocations Branch

PETITION FOR RULE MAKING

New Century Radio, Inc., licensee of FM broadcast station WFFN, which currently operates on Channel 237A at Cordova, Alabama, by its attorney and pursuant to Section 1.420(i) of the Commission's Rules, hereby requests that the Commission issue a Notice of Proposed Rule Making which looks toward amending the FM Table of Allotments, Section 73.207(b) of the Commission's Rules, by substituting Channel 237A for Channel 223A at Cordova, Alabama. New Century Radio, Inc. urges the Allocations Branch to allow Station WFFN to continue to operate on Channel 237A -- an application is pending before the Commission requesting authority for Station WFFN to operate on Channel 237A with 6 kw. If forced to operate on Channel 223A, New Century Radio, Inc. would have to (a) find a new transmitter, site, (b) obtain new studios and (c) provide a weaker signal to Station WFFN's core market area.

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Background Facts

On August 13, 1990, Radio South, Inc. ("RSI"), the then licensee of Station WFFN,^{1/} filed a Petition for Rule Making in MM Docket No. 90-476, requesting that the Commission issue a Notice of Proposed Rule Making looking toward the allotment of Channel 254C3 (or in the alternative, Channel 254A) at Cordova in lieu of Channel 237A. Although RSI was aware that Channel 223A could be allocated to Cordova, the Petition for Rule Making specifically requested Channel 254A as an alternative to Channel 237A in order to maintain Station WFFN's basic coverage area (a) without the need for a major site relocation and (b) without a substantial disruption of service to the station's existing core market area. As shown in the attached Engineering Exhibit of Kirk A. Tollett, Commsouth Media Associates, Channel 254A could be allotted with a modest site restriction of 3.1 kilometer east-northeast of Cordova, thereby assuring continuing coverage in Station's WFFN's core market. Moreover, since Station WFFN's studio and remote control points are located in Jasper, Alabama, it was the objective of RSI that any allocation be capable of covering the existing WFFN studio site. As the Engineering Exhibit points out, such coverage could be not accomplished by the allotment of Channel 223A.

^{1/} On September 27, 1993, the Commission granted an application on FCC Form 316 to assign the license of Station WFFN from Radio South, Inc. to New Century Radio, Inc. (BALH-930903GO). Houston L. Pearce holds a majority of the stock of both corporations.

In response to RSI's Petition for Rule Making, the Commission issued a Notice of Proposed Rule Making, 5 FCC Rcd 630 (1990), proposing the substitution of Channel 254C3 (or, in the alternative, Channel 254A) for Channel 237A at Cordova and modification of the license of Station WFFN accordingly. The Notice also proposed the substitution of Channel 237A for Channel 254A at Warrior, Alabama, and Channel 260A for Channel 235A at Holly Pond, Alabama. Three counterproposals were filed seeking the allotment of new FM channels to Fairview, Falkville and Eva, Alabama.

On May 13, 1993, subsequent to the release of the Notice, RSI filed an application for modification of the WFFN license. This application specified a site at which Station WFFN could operate on Channel 237 as a full Class A facility, without the necessity of a directional antenna. This proposed site met the mileage separation criteria of Section 73.207(b)(1), with the exception of the "cut-off" pending application of Good Earth Broadcasting for a new FM station on Channel 238A at Holly Pond (File No. BPH-900122NT).

In a Report and Order released on August 26, 1993, 7 FCC Rcd 5489, the Chief of the Allocations Branch allotted Channel 260A to Eva, Alabama, and denied RSI's proposal to upgrade Channel 237A to Channel 254C3 or in the alternative, to allot Channel 254A. However, the Allocations Branch, acting on its own

motion^{2/}, allotted Channel 223A at Cordova and modified Station WFFN's authorization to specify the alternate Class A channel. The channel modification was authorized in order to enable the licensee to increase the power of Station WFFN to 6 kw. Noting that RSI had requested a site in its Petition for Rule Making other than that from which it is currently operating, the Allocations Branch concluded that "[t]he allotment of Channel 223A at Cordova can be made at a different site from that specified in the petition for rule making." Report and Order, at n.8. The Branch made the allotment of Channel 223A at Cordova "at a restricted site 9 kilometers (5.6 miles) south of Cordova at coordinates 33-40-38 and 87-11-33." Id.

In a Memorandum Opinion and Order released on September 29, 1993 (DA 93-1130), the Chief of the Policy and Rules Division granted a Joint Request for Approval of Settlement Agreement between North Jefferson Broadcasting Company and RSI whereby RSI withdrew its Petition for Reconsideration. The Memorandum Opinion and Order also denied a Petition for Reconsideration filed by Haleyville Broadcasting Company, Inc., licensee of Station WJBB(FM), Channel 224A, which contended that Station WFFN, operating on Channel 223A at Cordova, would cause interference to Station WJBB operating on Channel 224A. Pointing

2/ "Although a staff engineering analysis reveals that there are no alternate channels to accommodate the upgrade at Cordova, that staff analysis does reveal that an additional Class A channel, Channel 223A, could be allotted to Cordova, which would allow petitioner to increase power to 6 kw." Report and Order, ¶ 7.

out that Haleyville Broadcasting Company had submitted no engineering exhibit in support of its contention, the Chief of the Policy and Rules Division determined that the interfering contour (54 dBu) of a Channel 223A allotment at Cordova operating with full facilities would not cause interference to the protected service contour (60 Dbu) of Station WJBB. In addition, the Chief pointed out that the Channel 223A allotment complies with the minimum spacing requirements of Section 73.207 with respect to Station WJBB.

**Public Interest Reasons
Supporting the Requested Channel Modification**

As noted earlier, the Chief of the Allocations Branch, in a move designed to accommodate WFFN's need for increased power to serve its listeners, allotted Channel 223A to Cordova in substitution of Channel 237A, WFFN's present channel. Such action was taken by the Branch on its motion. The Report and Order specifying the channel modification pointed out that the allotment of Channel 223A at Cordova would be made at a different site than that specified in RSI's Petition for Rule Making and at a site which differs from Station WFFN's current site. The site restriction specified in the Report and Order would force Station WFFN to locate a site substantially to the south of Cordova.

This site restriction would prevent Station WFFN from achieving any improvement in service to the areas which rely on the station for local news and information. The areas, to the south, which would receive new service from Station WFFN on

Channel 223A are already abundantly served by signals from the Birmingham area. As shown in the attached Engineering Statement, over 90% of the city grade contour (3.16 mV/m or 70 Dbu) of a hypothetical maximum Class A facility on Channel 223A would fall within the city grade contour of at least eight other stations. Station WFFN, if it were to operate on Channel 223A, would be the ninth city grade service for approximately 26,480 people. Moreover, Channel 223A would provide only the second city grade service for less than one square kilometer or roughly 65 people. Moreover, Channel 223A would only provide the third city grade signal to an area of 14.4 square kilometers with a population of 566 people. However, if the Commission were to allow Station WFFN to remain on Channel 237A, WFFN would provide a second city grade signal to 118.3 square kilometers or a population of 7,384 people. Station WFFN would provide a third city grade service to 134.4 square kilometers or a population of 14,220. Moreover, Station WFFN, which provides the only true local full-time service to Walker County, would continue to provide a third city grade signal over Jasper. (As shown in an FM separation study for Channel 223A, it would be impossible to move Channel 223A any further north because of a spacing conflict with Station WAZK-FM, Trinity, Alabama.)

By contrast, an FM separation study for Channel 237A, at the site specified in the pending WFFN application, shows that the pending WFFN application meets all the spacing requirements of Section 73.207(b)(1) of the Commission's Rules with the exception

of the pending Good Earth Broadcasting application at Holly Pond. Since the Good Earth application already affords Station WFFN Section 73.215 contour protection, WFFN will be able to employ a non-directional antenna with a full six kilowatts at 100 meters above average terrain.

Since the change to Channel 223A will not improve Station WFFN's signal in the heart of Walker County or in the relatively unserved northern sections of the County where the need is greatest, the change to Channel 223A would force Station WFFN to relocate its transmitter site away from Cordova, its city of license, and away from its core market. Such a move to a site in the southeast portion of Walker County would take away the second and third city grade signal from 21,809 and add a ninth city grade service to 26,480 persons. Moreover, if forced to operate on Channel 223A at the restricted site location, the city grade signal of Station WFFN would not reach the present studio-remote control point located in downtown Jasper.

The public interest would be best served by allowing Station WFFN to continue to operate on Channel 237A at Cordova. Assuming, arguendo, that New Century Radio, Inc. could locate a suitable site in the restricted site area, operation on Channel 223A at such an antenna location would result in a net reduction of service to WFFN's core market area. Allowing Channel 237A to remain allotted to Cordova would promote the congressional mandate of Section 307(b) of the Communications Act by allowing 21,604 residents of Walker County to retain the only station

which locally originates programming of interest to County residents. Also, if Station WFFN were forced to move to Channel 223A, New Century Radio, Inc. would be required to locate a new transmitter site and to replace the station's existing studios -- all of which would be disruptive as well as economically injurious. Moreover, the rationale of the Allocations Branch for substituting Channel 223A for Channel 237A -- namely, that such a reallocation was the only way that Station WFFN could operate as a full Class A station -- is flawed as evidenced by the pending application to increase the power of Station WFFN operating on Channel 237A to 6 kw.

WHEREFOR, in view of the foregoing, New Century Radio, Inc. respectfully requests that the Allocations Branch issue a Notice of Proposed Rule Making which look towards amending the FM Table of Allotments by substituting Channel 237A for Channel 223A at Cordova, Alabama.

Respectfully submitted

NEW CENTURY RADIO, INC.

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January 25, 1994
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Petition for Rule Making

Technical Exhibit

January 18, 1994

INTRODUCTION

This engineering exhibit and the attached figures have been prepared on behalf of New Century Radio, Inc., licensee of Radio Station WFFN-FM, Cordova, Alabama. This statement is in support of a Petition for Rule Making requesting reinstatement of FM Channel 237A in lieu of Channel 223A in Cordova, Alabama. Channel 223A was assigned to Cordova, Alabama, as a result of FCC Docket 90-476 with a site restriction of 9.0 kilometers south. New Century Radio, Inc. currently operates WFFN on Channel 237A.

DISCUSSION

Initially, Radio Station WFFN operated on Channel 225A at Cordova. However, following the Commission's substitution of Channel 237A for Channel 225A in MM Docket 87-451, WFFN filed an application for and was granted a construction permit to operate on Channel 237A (File No. BPH-890510IB).

Channel 237A was allocated at Cordova prior to the adoption of the Second Report and Order in MM Docket No. 88-375, and did not meet the new minimum distance separation requirements specified in Section 73.207(b)(1) for operation as a non-directional six kilowatt Class A facility.

Because of short spacing concerns, WFFN was forced to find a less short spaced site and to utilize a directional antenna. This site proved to be substantially inferior to the originally licensed WFFN Channel 225A site.

In the original Petition for Rule Making filed in MM Docket 90-476, Radio South, Inc. (the previous licensee of WFFN) requested that the Commission issue a Notice of Proposed Rule Making looking toward the allotment of Channel 254C3 or in the alternative, Channel 254A to Cordova, Alabama, in lieu of Channel 237A. Although Radio South, Inc. was at that time aware that Channel 223A could be allocated to Cordova, it specifically requested Channel 254A as an alternative to Channel 237A in order to maintain the same basic coverage area without the need for a major site relocation and without a substantial disruption of service to its existing core market area. Furthermore, Channel 254A would have worked with only a modest site restriction of 3.1 kilometers east-northeast of Cordova, thereby assuring WFFN continuing coverage in its core market. Finally, since WFFN's studio and remote control points are located in Jasper, Alabama, it was necessary that any allocation be capable of covering the existing WFFN studio site, which Channel 223A is not capable of accomplishing.

On May 13, 1993, Radio South, Inc. filed an application for modification of the WFFN license. This application specified a site at which WFFN could operate on Channel 237 as a full Class A facility, without the necessity of a directional antenna.

This site met all the mileage separation criteria of Section 73.207(b)(1), with the exception of the "cut-off" pending application of Good Earth Broadcasting (File No. BPH-900122NT), for a new FM facility on Channel 238A at Holly Pond, Alabama.

Attached to this exhibit and labeled Figure 1 is a full scale reproduction of the "Atlanta" 1:500,000 scale NOAA Sectional Flight Map, upon which has been superimposed all city grade signals (3.16 mV/m or 70 dBu) which penetrate the city grade contour of either the facility proposed by WFFN in BPH-930513IC or a hypothetical maximum Class A facility on Channel 223A, utilizing the FCC reference coordinates for this allocation. The following FM stations place a city grade (3.16 mV/m) within the proposed city grade signal of WFFN operating with maximum facilities on either Channel 237A or Channel 225A:

WDJC	Channel 229C	Birmingham, AL
WAPI	Channel 233C	Birmingham, AL
WMJJ	Channel 243C	Birmingham, AL
WZRR	Channel 258C1	Birmingham, AL
WZBQ	Channel 273C	Jasper, AL
WZZK	Channel 284C	Birmingham, AL
WODL	Channel 295C	Birmingham, AL
WENN	Channel 299C	Birmingham, AL

As can be gleaned from Figure 1, over 90% of the city grade contour of Channel 223A (92.5 MHz) would fall within the city grade contour of at least eight other stations: this would make Channel 225A the ninth city grade service for approximately 26,480 people. Channel 223A would provide only the 2nd city grade service for less than one square kilometer

or roughly 65 people. Channel 223A would only provide the third city grade signal to an area of 14.4 square kilometers with a population of 566 people. On the other hand, if the Commission were to allow WFFN to remain on Channel 237A, this would enable WFFN to provide a second city grade signal to 118.3 square kilometers or a population of 7,384 people. WFFN would provide a third city grade service to 134.4 square kilometers or a population of 14,220. As also can be observed in Figure 1, WFFN would continue to provide a third city grade signal over Jasper, Alabama, and the only true local full time service to this area. (The above population data was derived from the 1990 U.S. Census utilizing census tract data. A polar planimeter was used to determine the percentage of area and hence population within each pertinent tract.)

Figure 2 is an FM separation study for Channel 223A. As can be determined from this study, it would be impossible to move Channel 223A any further north because of a spacing conflict with Station WAZK-FM in Trinity, Alabama. Although not included in this report, a short space study was undertaken to determine if WAZK could be short spaced pursuant to Section 73.215; however, terrain averages between the Cordova site and the WAZK site would not allow any reasonable short spacing.

Figure 3 is an FM separation study for Channel 237A, at the site specified in the pending WFFN application. As can be gleaned from this study, the pending WFFN application meets all the spacing requirements of Section 73.207(b)(1) with the exception of the pending Good Earth Broadcasting

application at Holly Pond, Alabama. Since the Good Earth application already affords WFFN Section 73.215 contour protection, WFFN will be able to employ a non-directional antenna with a full six kilowatts at 100 meters above average terrain.

Conclusion

Since 1987, Radio Station WFFN has been the only FM Station originating its programming from Walker County. While broadcasting first on Channel 225A and now on Channel 237A, WFFN has been able to serve Walker County from basically the center of the County (Figure 5). Should the Commission require WFFN to relocate to Channel 223A, WFFN would be required to move to a site in the southeast portion of Walker County which would take the second and third city grade signal away from 21,604 people, and add a ninth city grade service to 26,480 persons. As can be ascertained from Figure 4, the city grade signal of WFFN would not be capable of reaching the present studio-remote control point located in downtown Jasper, Alabama.

Finally, it has been the long standing policy of the Commission as mandated by Congress pursuant to Section 307(b) of the Communications Act to allow the most efficient use of available spectrum in order to advance the public interest, convenience, and necessity. Allowing Channel 237A to remain allocated to Cordova, Alabama would serve the public interest by allowing 21,604 persons in Walker County Alabama, to retain a strong local station. Furthermore, it may be possible that Channel 223A may be better utilized at some other location.

FIGURES INDEX

FIGURE 1CITY GRADE SIGNAL
ANALYSIS

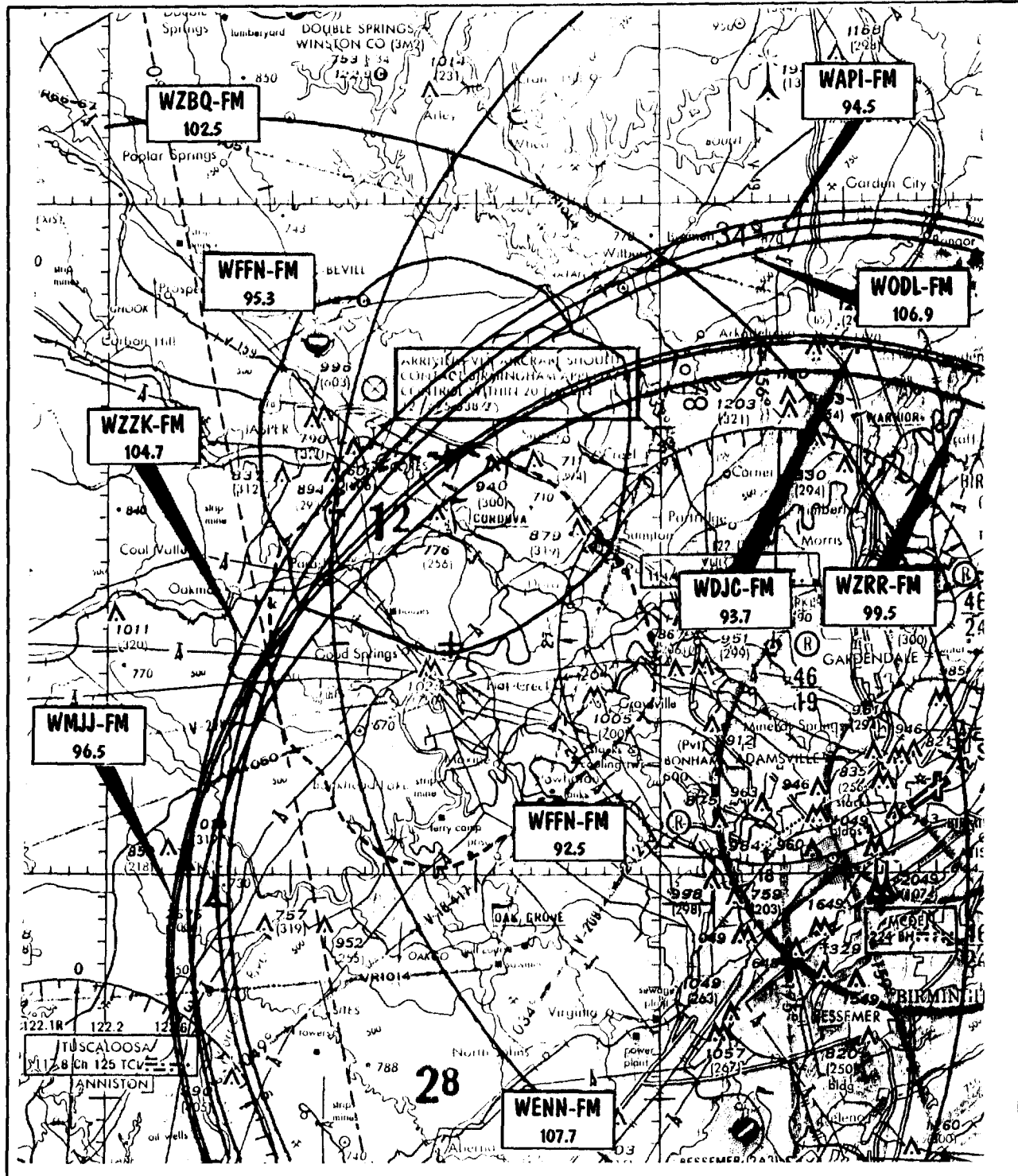
FIGURE 2.....FM SEPARATION STUDY
CHANNEL 223A

FIGURE 3.....FM SEPARATION STUDY
CHANNEL 237A

FIGURE 4.....COVERAGE CONTOUR
MAP-CHANNEL 223A

FIGURE 5.....COVERAGE CONTOUR
MAP-CHANNEL 237A

FIGURE 1
CITY GRADE SIGNAL ANALYSIS
NEW CENTURY RADIO, INC.
RADIO STATION WFFN-FM
CORDOVA, ALABAMA



Scale 1:500,000

1 inch equals approximately 8 miles

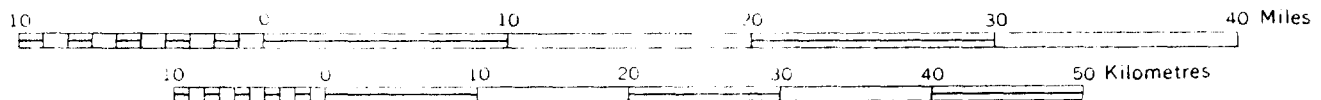


FIGURE 2
FM SEPARATION STUDY
NEW CENTURY RADIO, INC.
WFFN-FM, CHANNEL 223A
CORDOVA, ALABAMA

FM search of channel 223A+ (92.5 MHz), at N. 33 40 38, W. 87 11 33.

Searching Channel 223A+ (92.5 MHz):

CALL	CITY	ST	CHN	CL	S	DIST	SEPN	BRNG	CLEARANCE
WGIB	Birmingham	AL	220	A	L	41.5	31.0	121.1°	10.5
ALC	Cullman	AL	221	A	U	64.1	31.0	30.4°	33.1
ALC	Hamilton	AL	221	A	U	88.5	31.0	303.4°	57.5
WERHFM	Hamilton	AL	221	A	L	88.5	31.0	303.4°	57.5
WKUL	Cullman	AL	221	A	L	64.1	31.0	30.4°	33.1
ALC	Montgomery	AL	222	C	U	169.1	165.0	146.6°	4.1
WLWIFM	Montgomery	AL	222	C	L	169.2	165.0	146.6°	4.2
ALC	Chattanooga	TN	222	C	U	236.0	165.0	46.7°	71.0
WDERFM	Chattanooga	TN	222	C	L	236.0	165.0	46.7°	71.0
ALC	Cordova	AL	223	A	V	0.0	115.0	0.0°	-115.0
WAZK	Trinity	AL	223	A	C	115.0	115.0	5.1°	0.0
ALC	Forest	MS	223	C	U	254.4	226.0	235.1°	28.4
ALC	Baldwyn	MS	223	A	U	160.4	115.0	300.7°	45.4
WESE	Baldwyn	MS	223	A	L	161.9	115.0	301.6°	46.9
WESE	Baldwyn	MS	223	A	A	161.9	115.0	301.6°	46.9
WQSTFM	Forest	MS	223	C	L	254.4	226.0	235.1°	28.4
ALC	Arab	AL	224	A	U	102.0	72.0	43.0°	30.0
ALC	Talladega	AL	224	A	U	96.3	72.0	107.8°	24.3
ALC	Haleyville	AL	224	A	U	73.5	72.0	327.0°	1.5
NEW-T	Birmingham	AL	224	D	A	41.7	0.0	120.9°	41.7
WCRQFM	Arab	AL	224	A	L	102.0	72.0	43.0°	30.0
WCRQFM	Arab	AL	224	A	C	102.0	72.0	42.9°	30.0
WCRQFM	Arab	AL	224	A	C	102.0	72.0	42.9°	30.0
WEYYFM	Talladega	AL	224	A	L	96.3	72.0	107.8°	24.3
WJBBFM	Haleyville	AL	224	A	L	73.5	72.0	327.0°	1.5
WJBBFM	Haleyville	AL	224	A	C	79.0	72.0	322.9°	7.0
ALC	Tuscaloosa	AL	225	C1	U	75.9	75.0	205.6°	0.9
WTUGFM	Tuscaloosa	AL	225	C1	L	76.7	75.0	205.7°	1.7
NEW-T	Center Point	AL	226	D	A	47.2	0.0	106.0°	47.2
W276AG	Center Point, etc.	AL	276	D	L	47.3	0.0	105.6°	47.3

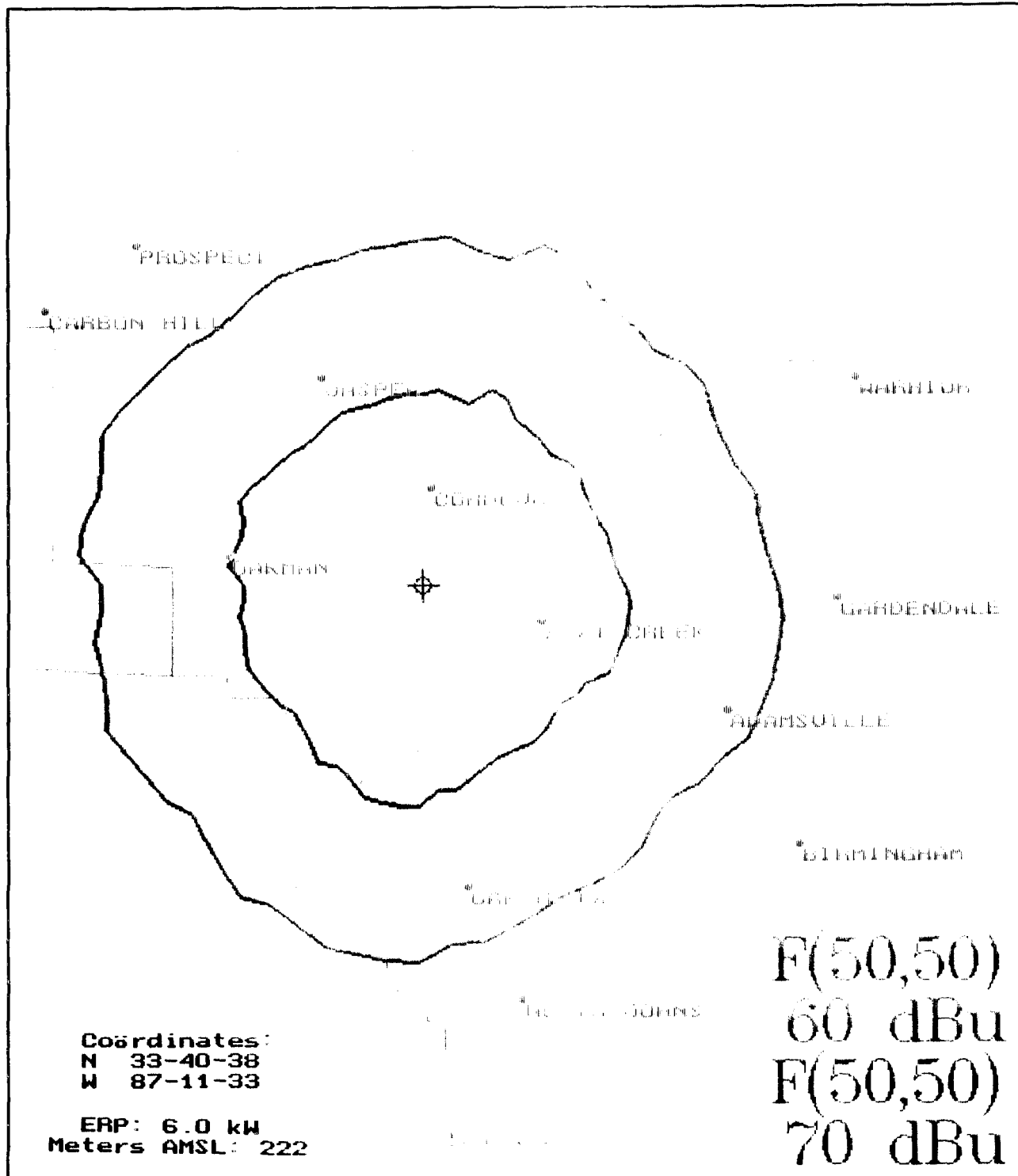
FIGURE 3
FM SEPARATION STUDY
NEW CENTURY RADIO, INC.
WFFN-FM, CHANNEL 237A
CORDOVA, ALABAMA

FM search of channel 237A+ (95.3 MHz), at N. 33 49 1, W. 87 11 55.

Searching Channel 237A+ (95.3 MHz), from the site of WFFN:

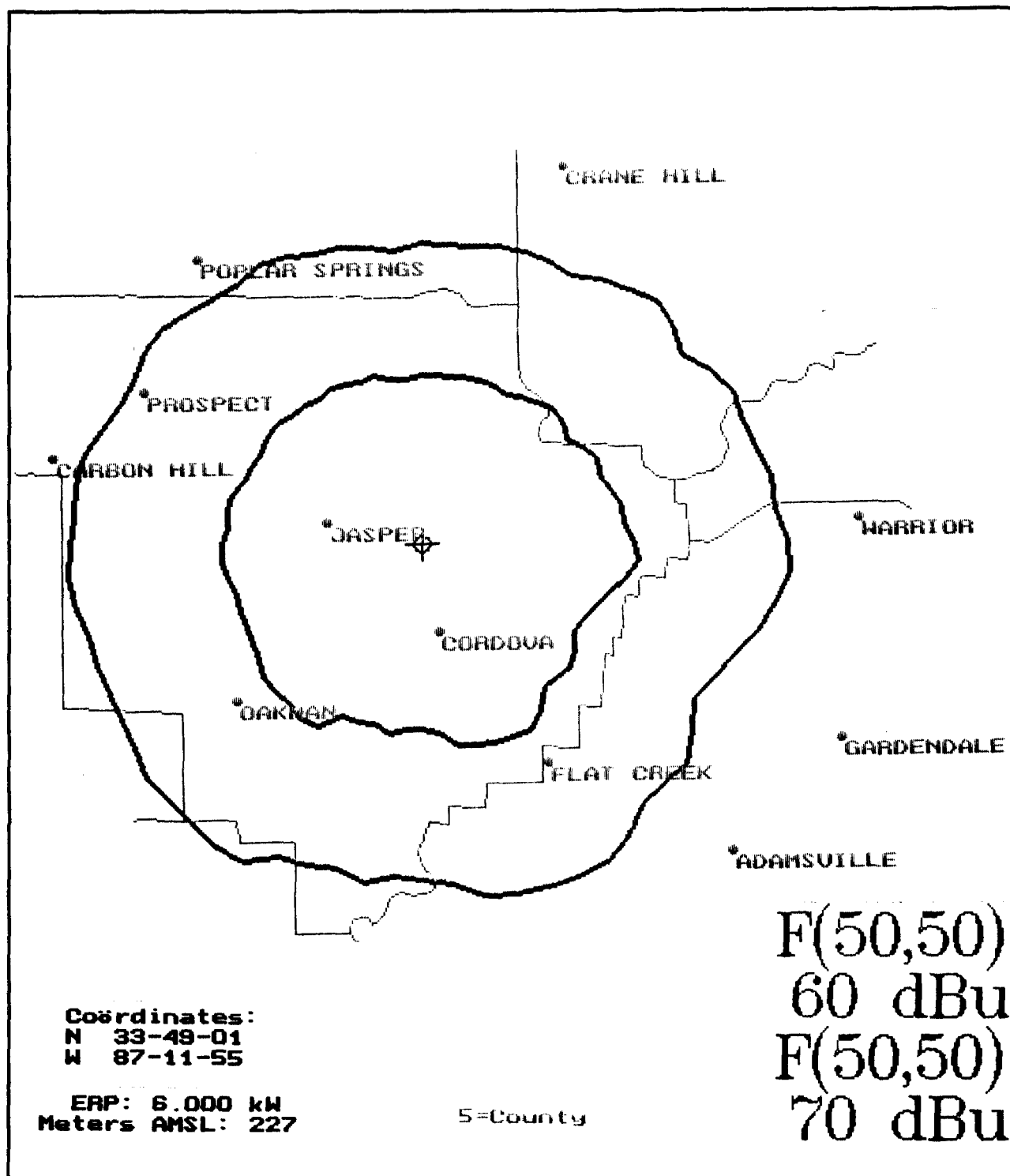
CALL	CITY	ST	CHN	CL	S	DIST	SEPN	BRNG	CLEARANCE
ALC	Columbus	MS	235	C2	U	106.6	55.0	249.3°	51.6
WKORFM	Columbus	MS	235	C2	C	106.6	55.0	249.3°	51.6
ALC	Huntsville	AL	236	C2	U	114.0	106.0	29.0°	8.0
ALC	Prattville	AL	236	C2	U	167.4	106.0	153.7°	61.4
WNDA	Huntsville	AL	236	C2	L	114.0	106.0	29.0°	8.0
WXFX	Prattville	AL	236	C2	L	167.1	106.0	153.7°	61.1
WASZ	Ashland	AL	237	A	L	137.4	115.0	114.2°	22.4
WFFN	Cordova	AL	237	A	A	0.0	115.0	0.0°	-115.0
WFFN	Cordova	AL	237	A	L	10.5	115.0	287.2°	-104.5
ALC	Coosa	GA	237	A	U	176.2	115.0	74.9°	61.2
WSRM	Coosa	GA	237	A	C	176.0	115.0	76.2°	61.0
WSRM	Coosa	GA	237	A	A	187.8	115.0	75.7°	72.8
ALC	Amory	MS	237	A	U	120.9	115.0	278.4°	5.9
ALC	Corinth	MS	237	A	U	166.9	115.0	317.6°	51.9
WADI	Corinth	MS	237	A	L	166.9	115.0	317.6°	51.9
WAFM	Amory	MS	237	A	L	120.9	115.0	278.4°	5.9
ALC	Ashland	AL	238	A	V	137.4	72.0	114.2°	65.4
ALC	Holly Pond	AL	238	A	V	65.7	72.0	55.7°	-6.3
NEW	Holly Pond	AL	238	A	A	56.3	72.0	55.5°	-15.7
ALC	Tuscaloosa	AL	239	C1	U	75.0	75.0	204.5°	0.0
WFFX	Tuscaloosa	AL	239	C1	L	75.0	75.0	204.5°	0.0
WFFX	Tuscaloosa	AL	239	C1	C	90.7	75.0	201.1°	15.7
ALC	Guntersville	AL	240	C3	V	110.4	42.0	55.2°	68.4
WTWAFM	Guntersville	AL	240	A	L	102.2	31.0	55.8°	71.2
ALC	Winfield	AL	290	A	U	52.6	10.0	279.4°	42.6
ALC	Trussville	AL	290	A	U	57.2	10.0	113.8°	47.2
WKXNFM	Winfield	AL	290	A	L	60.6	10.0	293.1°	50.6
WVBR	Trussville	AL	290	A	C	54.0	10.0	121.8°	44.0
ALC	Hartselle	AL	291	C3	U	83.8	12.0	32.7°	71.8
WTAKFM	Hartselle	AL	291	A	C	80.1	10.0	23.0°	70.1
WTAKFM	Hartselle	AL	291	C3	C	88.0	12.0	35.6°	76.0

FIGURE 4
COVERAGE CONTOURS
NEW CENTURY RADIO, INC.
WFFN-FM, CHANNEL 223A
CORDOVA, ALABAMA



Kilometer Scale
 0 5 10 15 20 25 30

FIGURE 5
COVERAGE CONTOURS
NEW CENTURY RADIO, INC.
WFFN-FM, CHANNEL 237A
CORDOVA, ALABAMA



Kilometer Scale
 0 5 10 15 20 25 30

CERTIFICATION

Kirk A. Tollett hereby certifies that;

He is owner of Commsouth Media Associates, a broadcast consulting firm based in Jasper, Alabama;

His qualifications in broadcast matters are a matter of record before the Federal Communications Commission having been presented and accepted on many occasions in the past;

That he has been retained by New Century Radio, Inc., for the purpose of developing technical exhibits and analyses for the instant filing;

That the accompanying technical report and exhibits were developed by him personally or under his immediate supervision and that all the information presented therein is true and correct to the best of his knowledge and belief.

Signed and dated this 18th day of January, 1994

A handwritten signature in black ink, appearing to read 'Kirk A. Tollett', is written over a horizontal line.

Kirk A. Tollett
Commsouth Media Associates
4001 Highway 78 East
Jasper, Alabama 35501

CERTIFICATE OF SERVICE

I, Anastasia C. Chung, a secretary in the law firm of Verner, Liipfert, Bernhard, McPherson and Hand, Chartered, do hereby certify that the foregoing "Petition for Rule Making" was mailed first-class, postage prepaid, this 25th day of January, 1994, to the following:

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Anastasia C. Chung